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March 27, 2008

Honorable Richard J. Howell
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1950
New York, New York 10007

Via Facsimile: (212) 805-7948

RE: *Brown v. Pax Ventures, LLC*
CASE NO.: 07-cv-3273 (RJH)

Honorable Judge Richard J. Howell:

This firm represents Plaintiff, Christopher E. Brown in the above referenced action. As per the parties' endorsed letter signed by Judge Loretta A. Preska on January 16, 2008, "all fact discovery shall be completed by March 28, 2008." However, the parties are currently in the final stages of settlement and anticipate resolving this matter in a near future. Accordingly, the parties respectfully request this Court to extend all discovery deadlines by thirty (30) days. This is the parties' second extension request.

This extension is not intended for the purposes of delay and will not prejudice either party. Plaintiff has contacted Defense counsel's office and Associate Michael Nachtröm has consented to the foregoing.

Application Granted
Partial conference
adjourned to
5/2/08 J

Respectfully Submitted,

Allan J.P. Rooney, Esq.

cc: Zoe Davidson
Stacie B. Feldman

10100 a-

SO ORDERED

US DJ

3/28/08

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NAME: Honorable Richard J. Howell, Esq.
FAX: (212) 805-7948
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FROM: Ku & Mussman, P.A.
DATE: 03/27/08
SUBJECT: *Christopher Brown v. Pax Ventures, LLC*
PAGES: 2

☐ By fax only. No hard copy sent.
☒ By fax and mail. Hard copy sent.

COMMENTS: Enclosed please find a copy of Plaintiff's letter requesting discovery deadline extension.

Best regards,

Allan J.P. Rooney, Esq.

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